

Baker Petrolite

12645 West Airport Blvd. Sugar Land, TX 77478 USA Tel 281-275-7345 Fax 281-275-7385 Web site: www.bakerhughes.com/bapt

Halina E. Caravello
Director
Health, Safety, Environmental
Quality & Regulatory Affairs

August 31, 2000

The Performance Track Information Center C/O Industrial Economics Incorporated 2067 Massachusetts Avenue Cambridge, MA 02140

Subject: Performance Track Application

E Caravello

Dear Sir/Madam:

I am please to submit the Performance Track Application for the Taft, California Repackaging Facility of Baker Petrolite Incorporated. This facility employs dedicated employees that are committed to continual improvement and embody the tenants of this program. We are pleased to be considered for this program. Should you have any questions require additional information, please feel to contact me at (281) 275-7345.

Sincerely,

Halina E. Caravello

xc: R. Mertz

J. Sanchez

B. Burks

B. Bonniver



National Environmental Achievement Track

Application Form

	Baker Petrolite
	Name of facility
****	BAKER HUGHES / Baker Petrolite
	Name of parent company (if any)
	19815 So. Lake Road
	Street address
• • • • • • • • • • • • • • • • • • • •	Street address (continued)
	Taft/CA/93268
	City/State/Zip code
Give us	information about your contact person for the
	I Environmental Achievement Track Program.
	· ·
Name	John A. Sanchez/Halina Caravello
Title	Sr. Supervisor/Director, HSE/Q&RA
Phone	(661) -763-1528/281-275-7345
Fax	(661) 765-6046/281-275-7385

E-mail John.Sanchez@Baker Petrolite.com/Halina.Caravello@BakerPetrolite.com

EPA needs background information on your facility to evaluate your application.

What do you need to do?

- Provide background information on your facility.
- Identify your environmental requirements.



1	What do you do or make at your facility?	Repackage Acrolein into field containers for use as a registered aquatic herbicide, registered microbiocide, and as a sulfide scavenger
2	List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.	SIC 2879 NAICS
3	Does your company meet the Small Business Administration definition of a small business for your sector?	☐ Yes
4	How many employees (full-time equivalents) currently work at your facility?	☐ Fewer than 50☐ 50-99☐ 100-499☐ 500-1,000☐ More than 1,000

5	Does your facility have an EPA ID number(s)?		□No
	If yes, list in the right-hand column.	107-CA-005 CAD98116778	
6	Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right or enclose a		
	completed Checklist with your application.	_	
7	Check the appropriate box in the right-hand column.		he requirements above. ed the Checklist with my
8	Optional: Is there anything else you would like to tell us about your facility?	facility. No ble manufacturing small operatio The plant is ISC Responsible Corepackaging s the nature of t (toxic, inhalatic checked for le connections a	chemical, dedicated, repackaging ending, formulation or g takes place. The facility is a very on, with only 5 full time equivalents. D 9001 & ISO 14001 certified, and is a are facility. The "closed loop" system is of a very tight design due to the chemical repackaged, acrolein on hazard). All lines are visually eaks weekly. Quarterly all lines and are inspected, by an outside firm, ectors as part of the test program.
		Steps we have responsible pro a. Recycle all b. recycle rinso as a valuable c. replaced oil with water bas ago); and d. installation of	e already put into place as oduct stewards include: products containers; ate from container cleaning process product (since 1988); I based container painting system sed paint and airless sprayer (3 years of excess flow valve in ISO hook up ossibility of release (1999).

Page 4

Application for the National Environmental Achievement Track

OMB Approved No. 2010-0032

Facilities must have an operating Environmental Management System (EMS) that meets certain requirements.

What do you need to do?

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS



- 1 Check yes if your EMS meets the requirements for each element below as defined in the instructions.
 - a. Environmental policy

X Yes

b. Planning

- X Yes
- C. Implementation and operation
- X Yes
- d. Checking and corrective action
- Yes

e. Management review

- 🛛 Yes
- 2 Have you completed at least one EMS cycle (plan-do-check-act)?
- 🛛 Yes
- 3 Did this cycle include both an EMS and a compliance audit?
- 🛛 Yes
- 4 Have you completed an objective selfassessment or third-party assessment of your EMS?
- X Yes

If yes, what method of EMS assessment did you use?

- ☐ Self-assessment
 - GEMI
- Ofher
- ☐ CEMP
- ☐ Third-party assessment
 - ISO 14001 Certification
 ■
 - ☐ Other

Facilities must show that they are committed to improving their environmental performance. This med that you can describe past achievements and will madure commitments.

What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions Land 2.



1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	What was the pro (2 years ago)?	evious level	What is the current level?	
Accidental release	Quantity	Units	Quantity	Units
	0	O	0	0

i. How is the current level an improvement over the previous level?

Through our diligent efforts, we have been able to maintain a 0 quantity release rate. As a recent effort, we added an excess flow valve on the discharge line for bulk containers. In the unlikely event that a line rupture occurs, this excess flow valve will prevent release of the bulk tank's contents. Facility and other support personnel are always working to improve process equipment to ensure a 0 rate is maintained.

ii. How did you achieve this improvement?

For the latest improvement, we conducted a review of the system and determined the correct size and design of valve, adapted fittings and installed valve. Completed a Management of Change, to maintain compliance with our Process Safety Management System.

Second aspect you've selected

What aspect have	What was the previous level		What is the current level?	
you selected? Reduction of liquid hazardous	(2 years ago)? Quantity 25,000	Units gallons	Quantity 0	Units gallons
waste				
i. How is the current leve previous level?	l an improvement o	ver the		
Although this improver eliminate the major ha				completely

ii. How did you achieve this improvement?

For years the methanol/acrolein mixture resulting from cleaning of the reuseable field containers was collected and sent for offsite disposal. We worked extensively with our oilfield research group to find recycling opportunities and a possible application for this material. The material is now used as a hydrate inhibitor in gas wells by oilfield customers. The operatiors no longer need to purchase virgin methanol for use as a hydrate inhibitor. By using our methanol/ acrolein mixture, they get the additional benefit of the acrolein for scavenging toxic hydrogen sulfide from the gas. Baker Petrolite benefits by not having to dispose of the material. The environment benefits because we have created a decrease in the need for methanol production and use.

2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

Note to small facilities: If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

First aspect you've selected

		•
a. What is the aspect?	Solid Waste - non product	
 b. Is this aspect identified as significant in your EMS? 	Yes □ No No No No No No No No No No	
c. What is the current level? You may choose to state this as an absolute value or in terms of units of	Option A: Absolute value	97 cu.ft./ week (Quantity/Units)
production or output.	Option B:	(Quality) Office)

units of production or output	(Quantity/Units)		
Option A: Absolute value	1000 lbs./ year (Quantity/Units)		
Option B: In terms of units of production or output	(Quantity/Units)		
 Identify a recycling outle and office (paper) waste. 	et for empty paint cans,		
2. Purchase and recondition storage bins to hold recyclable materials.			
3. Regularly transport stora	ge bins to recyclers.		
Minus Carlos Car			
Solid Waste - product			
✓ Option A: Absolute value✓ Option B:	12 tons/ year (Quantity/Units)		
In terms of units of production or output	(Quantity/Units)		
Option A: Absolute value	reduce to 10 tons/year (Quantity/Units)		
Option B:In terms ofunits of productionor output	(Quantity/Units)		
packaging facility. All con inspection and/or repair, the of polymer formation (solic are to be purged and test prior to fitting. By minimizing containers, we optimize pri	tainers are opened for nis creates the potenial I waste). All containers ed for residual oxygen g the oxygen level in full oduct shelf life and		
	or output Option A: Absolute value Option B: In terms of units of production or output I. Identify a recycling outle and office (paper) waste. 2. Purchase and recondition recyclable materials. 3. Regularly transport stora Solid Waste - product Yes No Option A: Absolute value Option B: In terms of units of production or output Option A: Absolute value Option A: Absolute value Option B: In terms of units of production Option B: In terms of units of production		

Third aspect you've selected		
a. What is the aspect?	Reducing the footprint of the scenario for release of acrole	
b. Is this aspect identified as significant in your EMS?	⊠ Yes □ No	
c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.	Option A: Absolute value Option B: In terms of units of production or output	25/6.3 miles (Quantity/Units) (Quantity/Units)
d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.	Option A: Absolute value Option B: In terms of units of production or output	reduce by 5% (Quantity/Units) (Quantity/Units)
e. How will you achieve this improvement?	We plan to conduct an extending process safety review to determine to make operations to minimize the imparelease. This review is scheda 2000.	rmine what in facility or pact in the event of
Fourth aspect you've selected		
a. What is the aspect?	Prevention of accidental relea	ase
b. Is this aspect identified as significant in your EMS?	☑ Yes ☐ No	
c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.	Option A: Absolute value Option B: In terms of units of production or output	0 (Quantity/Units) (Quantity/Units)
d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.	Option A: Absolute value Option B: In terms of units of production or output	0 (Quantity/Units) (Quantity/Units)

e. How will you achieve this improvement?

Through our diligent efforts, we have been able to maintain a 0 quantity release rate. However, we are always looking for ways to improve our operation. We have located a better locking system for the valve handles on our field containers. We have plans to add these locking systems to all field containers (estimated 3900-4000 containers in the fleet) over the next 3 years.

Facilities must demonstrate their commitment to public outreach and performance reporting. You should hav appropriate mechanisms in place to identify communicancems, to communicate with the public, and to proinformation on your environmental performance.



What do you need to do?

- Describe your approach to public outreach.
- List three references who are familiar with your facility.
- $1\,$ How do you identify and respond to community 1. Open house - public meeting concerns? 2. Quarterly community outreach / Responsible Care activities 3.Personal communication with local businesses $2\,$ How do you inform community members of Same as above important matters that affect them? 3 How will you make the Achievement Track ☑ Website www.bakerhughes.com/BakerPetrolite Annual Performance Report available to the **public?** ■ Newspaper Open Houses Other

4	Are there any ongoing citizen suits against your facility?	☐ Yes	⊠ №	
	If yes, describe briefly in the right-hand column.			

5 List references below

	Organization	Name	Phone number
Representative of a Community/ Citizen Group	Horace Mann School	Nancy Olcott, Principal	661-631-5360
State/Local Regulator	Kern County Board of Supervisors	Ken Peterson	661-868-3680
Other community/local reference	Kern County Environmental Health Services Department	Dan Starky	661-862-8700



On behalf of Baker Petrolite Corporation's [my facility],

I certify that

- I have read and agree to the terms and conditions, as specified in the National Environmental Achievement Track Program Description and in the Application Instructions;
- I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Achievement
 Track EMS requirements, including systems to maintain compliance with all applicable federal,
 state, tribal, and local environmental requirements, in place at the facility, and the EMS will be
 maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any
 were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry,
 currently in compliance with applicable federal, state, tribal, and local environmental
 requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date of oh anche

Printed Name/Title John A. Sanchez / Sr. Supervisor

Facility Name Baker Petrolite

Facility Street Address 19815 So. Lake Road

Facility ID Numbers CAD98116778

8/24/00

The National Environmental Performance Track is a U.S. Environmental Protection Agency program. Please direct inquiries to 1-888-339-PTRK or e-mail ptrack@indecon.com. Mail completed applications to:

The Performance Track Information Center c/o Industrial Economics Incorporated 2067 Massachusetts Avenue Cambridge, MA 02140

National Environmental Achievement Track

Environmental Requirements Checklist

The following Checklist is provided to assist facilities in answering Section A, Tell us about your facility," Question 6. The Checklist is given to help facilities identify the major federal, state, tribal, and local environmental requirements applicable at their facilities. The Checklist is not intended to be an exhaustive list of all environmental requirements that may be applicable at an individual facility.

If you use this *Checklist* and choose to submit it with your application, fill in your facility information below and enclose the completed *Checklist* with your application (see instructions).

Facility Na	me: Baker Petrolite Repackaging Plant	-
Facility Lo	cation: Taft, California	-
•	Number(s): 107-CA-005 CAD98116778	-
(anach aaa	itional sheets if necessary)	
		Check All
Air Pollution	n Regulations	That Apply
		11m121pp1y
1.	National Emission Standards for Hazardous Air Pollutants (40 CFR 61)	
2.	Permits and Registration of Air Pollution Sources	囟
3.	General Emission Standards, Prohibitions and Restrictions	X
4.	Control of Incinerators	
5.	Process Industry Emission Standards	
6.	Control of Fuel Burning Equipment	(X)
7.	Control of VOCs	☑
8.	Sampling, Testing and Reporting	₩ Ø
9.	Visible Emissions Standards	X
10.	Control of Fugitive Dust	XI
11.	Toxic Air Pollutants Control	X
12.	Vehicle Emissions Inspections and Testing	
Othe	er Federal, State, Tribal or Local Air Pollution Regulations Not Listed	Above (identify)
13.	California "Hot Spots" - AB2588	
14.	Risk Management Plans	\\

Hazardous Waste Management Regulations

	1.	Identification and Listing of Hazardous Waste (40 CFR 261)	Κ
		- Characteristic Waste	X
		- Listed Waste	Ŕ
	2.	Standards Applicable to Generators of Hazardous Waste (40 CFR 262)	⊠
		- Manifesting	Ø
		- Pre-transport requirements	×
		- Record keeping/reporting	X
	3.	Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)	
		- Transfer facility requirements	
		- Manifest system and record-keeping	
		- Hazardous waste discharges	
	4.	Standards for Owners and Operators of TSD Facilities (40 CFR 264)	
		- General facility standards	
		- Preparedness and prevention	
		- Contingency plan and emergency procedures	
		Manifest system, Record keeping and reporting	
		- Groundwater protection	
		- Financial requirements	
		- Use and management of containers	
		- Tanks	
		- Waste piles	
		- Land treatment	
		- Incinerators	
	5.	Interim Status Standards for TSD Owners and Operators (40 CFR 265)	
	6.	Interim Standards for Owners and Operators of New Hazardous Waste	
		Land Disposal Facilities (40 CFR 267)	
	7.	Administered Permit Program (Part B) (40 CFR 270)	
	••	Tallimotor of the trogram (tale b) (40 of R 270)	
	Other	Federal, State, Tribal or Local Hazardous Waste Management Regulation	ns Not
	Listed	Above (identify)	
	8.		
	9.		
TT	. J N #	-4- A.T. B7	
Hazar	<u>aous Ni</u>	aterials Management	
	1.	Control of Pollution by Oil and Hazardous Substances (33 CFR 153)	
	2.	Designation of Reportable Quantities and Notification of Hazardous	
		Materials Spill (40 CFR 302)	l⊘l
	3.	Hazardous Materials Transportation Regulations (49 CFR 172-173)	IX IX
	4.	Worker Right-to-Know Regulations (29 CFR 1910.1200)	123
	5.	Community Right-to-Know Regulations (40 CFR 350-372)	[X]
			LEN

6.	California Business Plan Requirements	Ċ
7.		Ε
Waste	Management	
1.	Criteria for Classification of Solid Waste Disposal Facilities	
1.	and Practices (40 CFR 257)	-
2.	Permit Requirements for Solid Waste Disposal Facilities	
3.	Installation of Systems of Refuse Disposal	
4.	Solid Waste Storage and Removal Requirements	χ
5.	Disposal Requirements for Special Wastes	[
Abo	er Federal, State, Tribal or Local Solid Waste Management Regulations Not Live (identify)	iste
6.		I
7.		ם
Pollu	tion Control Requirements	
1.	Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112)	
1. 2.	Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112) Designation of Hazardous Substances (40 CFR 116)	
1.	Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112) Designation of Hazardous Substances (40 CFR 116) Determination of Reportable Quantities for Hazardous Substances	Ē
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1. 2. 3.	Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112) Designation of Hazardous Substances (40 CFR 116) Determination of Reportable Quantities for Hazardous Substances (40 CFR 117) NPDES Permit Requirements (40 CFR 122) Toxic Pollutant Effluent Standards (40 CFR 129)	5
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1. 2. 3. 4. 5. 6. 7. 8.	Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112) Designation of Hazardous Substances (40 CFR 116) Determination of Reportable Quantities for Hazardous Substances (40 CFR 117) NPDES Permit Requirements (40 CFR 122) Toxic Pollutant Effluent Standards (40 CFR 129) General Pretreatment Regulations for Existing and New Sources (40 CFR 403) Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414) Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415)	
1. 2. 3. 4. 5. 6. 7.	Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112) Designation of Hazardous Substances (40 CFR 116) Determination of Reportable Quantities for Hazardous Substances (40 CFR 117) NPDES Permit Requirements (40 CFR 122) Toxic Pollutant Effluent Standards (40 CFR 129) General Pretreatment Regulations for Existing and New Sources (40 CFR 403) Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414) Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415) Plastics and Synthetics Point Source Effluent Guidelines and Standards	
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1. 2. 3. 4. 5. 6. 7. 8. 9.	Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112) Designation of Hazardous Substances (40 CFR 116) Determination of Reportable Quantities for Hazardous Substances	
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17.	Stormwater discharge permits	X
18.		
king W	ater Regulations	
1.	Underground Injection and Control Regulations, Crieria and Standards (40 CFR 144, 146)	
2.	National Primary Drinking Water Standards (40 CFR 141)	
3.	Community Water Systems, Monitoring and Reporting Requirements	
4.	(40 CFR 141)	
4.	Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources	
5.	Underground Injection Control Requirements	
6.	Monitoring, Reporting and Record keeping Requirements for Community	
	Water Systems	
8.		С
e Substa	ances_	
1.	Manufacture and Import of Chemicals, Record keeping and Reporting Requirements (40 CFR 704)	
2.	Import and Export of Chemicals (40 CFR 707)	Īχ
3.	Chemical Substances Inventory Reporting Requirements (40 CFR 710)	
4 .	Chemical Information Rules (40 CFR 712)	
5.	Health and Safety Data Reporting (40 CFR 716)	
6.	Pre-Manufacture Notifications (40 CFR 720)	
7.	PCB Distribution Use, Storage and Disposal (40 CFR 761)	
8. 9.	Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762) Storage and Disposal of Waste Material Containing TCDD (40 CFR 775)	, <u> </u>
Othe	r Federal, State, Tribal or Local Toxic Substances Regulations Not Listed Ab	
(iden	tify)	
10.	Adverse Effects Reporting under TSCA	K
10. 11.	Adverse Effects Reporting under TSCA	K

Pesticide Regulations

1.	FIFRA Pesticide Use Classification (40 CFR 162)	
2.	Procedures for Disposal and Storage of Pesticides and Containers	_
	(40 CFR 165)	ഠ
3.	Certification of Pesticide Applications (40 CFR 171)	
4.	Pesticide Licensing Requirements	X
5.	Labeling of Pesticides	IX I
6.	Pesticide Sales, Permits, Records, Application and Disposal Requirements	X
7.	Disposal of Pesticide Containers	
8.	Restricted Use and Prohibited Pesticides	赵
Otl	ner Federal, State, Tribal or Local Pesticides Regulations Not Listed Above	(identify)
9.		
10.		П
10.		
E	and all Classes His Device of the Control of the Co	
<u>Environme</u>	ental Clean-Up, Restoration, Corrective Action	
1.	Comprehensive Environmental Response, Compensation and Liability Act (Superfund) (identify)	
		_
2.	RCRA Corrective Action (identify)	
		Ĺ
		Ц
	•	
Ott	per Federal State Tribal or Legal Environmental Clean II- Bartanata C	
Act	ner Federal, State, Tribal or Local Environmental Clean-Up, Restoration, C ion Regulations Not Listed Above <i>(identify)</i>	orrective
3.		
		u
4.		